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CHINA NORTH EAST PETROLEUM
HOLDINGS LIMITED, WANG HONG JUN,
GUIZHI JU and ZHANG YANG

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

**In re China North East Petroleum
Holdings Limited Securities Litigation**

No. 10-CV-04577 (MGC) (THK)
ECF Case

THIS DOCUMENT RELATES TO:

All Actions

**SUPPLEMENTAL
DECLARATION OF JAIME J.
SANTOS IN SUPPORT
MOTION TO PERMIT COFFINO
LAW GROUP, LLP TO
WITHDRAW AS COUNSEL**

REQUEST FOR IN CAMERA
APPEARANCE

Hearing Date and Time: September
11, 2014 at 2:30 p.m.

DECLARATION OF JAIME J. SANTOS

I, Jaime J. Santos, hereby declare as follows:

1. I am an attorney admitted to practice law in the State of New York and also before the U.S. Districts Courts for the Southern and Eastern Districts of New York. I am also admitted to practice before the Northern and Eastern Districts of California. I am a partner in the law firm Coffino Law Group, LLP (“CLG”), counsel of record for China North East Petroleum Holdings Limited (“NEP”), Wang Hongjun, Guizhi Ju, and Zhang

Yang in this consolidated class action. I make this supplemental declaration in support of our original motion to Permit Coffino Law Group, LLP to Withdraw as Counsel of Record for Defendants China North East Petroleum Holdings Limited, Wang Hong Jun, Guizhi Ju, Zhang Yang. If called upon to do so, I could and would testify competently to the matters set forth in this declaration.

2. I incorporate by reference the entire contents of my original declaration dated October 14, 2013, which CLG submitted in support of our original motion to withdraw. Concurrently with this declaration, I am also filing a Corrected Original Declaration to Permit Coffino Law Group, LLP to Withdraw as Counsel of Record.

3. CLG now has two motions to withdraw pending before this Court. CLG filed the original motion to withdraw on October 14, 2013. The basis for the original motion was the failure of NEP to pay our invoices and to cooperate in the litigation. The Court has not ruled on the first motion. CLG recently filed a second motion to withdraw on July 9, 2014. The basis for the second motion is a conflict that arose between NEP and Mr. Hongjun Wang in connection with a recent court-ordered deposition. Both motions are now set for hearing on September 11, 2014 at 2:30 pm.

4. At the time we filed the first motion, NEP had not paid us anything against our outstanding invoices for eight months. Since October 2013, as we did before we filed the original motion, we have tried repeatedly to get paid, to no avail. We have received promises and, in fact, had agreed to discount our billings, if NEP paid the discounted amount in a 30 day period. That 30-day deadline is months past, and we have received nothing.

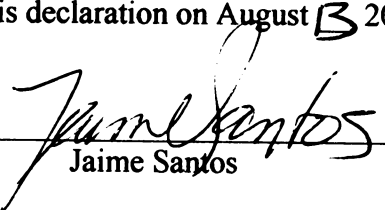
5. CLG has now worked loyally without any payment from NEP for 20 months. We are a firm of two attorneys. We cannot afford to continue as counsel in this action

without payment of our fees and client cooperation. Despite efforts to find out, we do not even know if NEP has any resources to pay us, nor do we know the state of its business.

6. Through July 2014, we have billings in this matter of **\$248,219.29** and for all matters we handle for NEP of **\$538,030.29**

7 As this Court knows, NEP did not, as the Court required, produce a witness to testify about its ability to perform the 2013 settlement in this consolidated class action. We (and others) have tried to determine the financial condition of NEP in connection with the settlement agreement issues that arose recently and that prompted this Court to allow plaintiff leave to depose a representative witness. CLG has made numerous attempts to gain the cooperation necessary to produce the required witness. We have sent more than 10 emails and participated in several phone calls and board meetings on this subject, to no avail.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I executed this declaration on August 13 2014.


Jaime Santos